UNITED STATES DISTRICT COURT

FILED

U.S. DISTRICT COURT DISTRICT OF VERMONT

FOR THE DISTRICT OF VERMONT

2015 JUL -2 PM 2: 40

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UNITED STATES OF AMERICA

Criminal No. 5:15-CR-97

WILLIAM ALLEN and KERISSA ALLEN, Defendants

v.

INDICTMENT

COUNT ONE

The Grand Jury charges:

In or about June 2014, in the District of Vermont, defendant WILLIAM ALLEN knowingly possessed at least one matter which contained visual depictions that had been shipped and transported using any means and facility of interstate and foreign commerce, and shipped and transported in and affecting interstate and foreign commerce, where the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(18 U.S.C. § 2252(a)(4))

COUNT TWO

The Grand Jury further charges:

In or about April 2015, in the District of Vermont, defendant KERISSA ALLEN knowingly possessed, and defendant WILLIAM ALLEN knowingly caused her possession of, at least one matter which contained visual depictions that had been mailed, and shipped and transported in and affecting interstate and foreign commerce, where the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(18 U.S.C. §§ 2252(a)(4), 2)

A TRUE BILL

FO

ERIC S. MILLER

United States Attorney

Burlington, Vermont

July 2, 2015